



Supplier Code of Conduct

December 31, 2025



Introduction

BE Semiconductor Industries N.V. (the “Company”, “Besi”, “we”, “us” or “our”) strives to operate with the highest ethical and sustainability standards while complying with all relevant laws, regulations and standards. We expect our suppliers to do the same.

This document outlines the standards we expect our suppliers to meet in areas such as human rights, product quality, health and safety, and the environment. We also ask these organizations to request that their own suppliers understand and promote the Besi Supplier Code of Conduct.

We will communicate this Code directly to all our suppliers and make it available to all interested parties via www.besi.com.

Besi expects suppliers to maintain sound business operations and provide full disclosure of management policies according to the Responsible Business Alliance ("RBA"), formerly the Electronic Industry Citizenship Coalition ("EICC"). This Code of Conduct establishes standards to ensure that working conditions in the electronics industry, or industries in which electronics are a key component, and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. Besi expects from its suppliers that their respective suppliers comply with the same.

Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in a sustainable manner and in full compliance with the laws, rules and regulations of the countries in which it operates. If, however, there are differing standards between the RBA Code and local law, the RBA defines conformance as meeting the strictest requirements. In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

Labor and Human Rights

Suppliers must be committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Inclusion, diversity and anti-discrimination

Our suppliers shall treat their employees with respect and dignity. Our Inclusion and Diversity Policy provides the framework for a corporate culture which values the individuality of each staff member and promotes equal opportunities – irrespective of age, disability, ethnic-cultural origin, gender, religion or belief, or sexual identity. Besi strives to ensure that all employment decisions are made on a non-discriminatory basis in accordance with applicable law, and otherwise adhering to the legislation and regulations relevant to Besi in all locations where the Company operates and conducts business. Our suppliers shall comply with these principles as well. Our suppliers must not tolerate any discrimination, harassment or offense for example on basis of race, color, national origin, gender, gender identity, religion, age, migrant status, disability, labor union or political affiliation, veteran status, sexual orientation, marital or family status. All forms



of sexual harassment, corporal punishment, physical coercion and verbal abuse shall be prohibited, as well as any intimidating, hostile or offensive conduct that interferes with an employee's work performance.

Forced labor

Besi is against any form of forced labor. Suppliers shall ensure that all work is voluntary. Hence, we demand that suppliers reject forced labor, including indentured labor, bonded labor and any other form of forced labor. Besi does not tolerate suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction or fraud. All work shall be voluntary, workers shall be free to leave work and terminate their employment or other work status with reasonable notice. Workers must not be required to pay recruitment expenses either in their home country or the country where work is performed.

Child/underage labor

Besi is against all forms of underage labor. Our suppliers must not permit work to be carried out by persons:

- Under the age of 15.
- Under the applicable minimum legal age for employment.
- Under the applicable age for completion of compulsory education, whichever is highest.

Exceptions apply to employment relationships in developing countries operating under the International Labor Organization ("ILO") Convention 138 or to governmental authorized job training or apprenticeship programs that clearly benefit the persons participating. Furthermore, workers under the age of 18 ("young workers") must not perform hazardous work that is likely to jeopardize their health or safety or that compromises their education (e.g. night shifts, overtime). Suppliers shall have a remediation plan in place, in the event of any underage labor found.

Working hours

Our suppliers shall meet local legal working hour and rest day requirements. Suppliers shall ensure overtime is voluntary and paid in accordance with local and national laws and regulations. Suppliers shall keep employee working hour and pay records in accordance with legal local and national laws and regulations. A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations.

Wages and benefits

Besi compensates its employees fairly for their work with wages that meet at least minimum legal standards and adhere to the applicable laws, regulations and agreements on general working conditions. We expect our suppliers to provide their workers a fair compensation, (including overtime pay and benefits) that, at a minimum, meet the legal minimum standards.

Freedom of association and collective bargaining

Besi expects its suppliers to respect workers' rights to freedom of association and collective bargaining in accordance with local legal requirements. Workers' rights to associate with others, form and join (or refrain from joining) must not be a subject for harassment, or discrimination or retaliation.



Grievance mechanisms

In addition, our suppliers shall ensure that their employees are able to communicate and share grievances openly with management regarding working conditions and management practices without any fear of reprisal, intimidation or harassment. The grievance procedures provided shall be accessible and shall include the option to report anonymously where appropriate. Suppliers shall periodically provide workers with information and training on all grievance procedures.

Third party employment agencies

Besi expects our suppliers to ensure that the third-party recruitment agencies it uses are compliant with the standards and practices covered by Besi's Supplier Code of Conduct and that they act ethically and in the best interests of workers when contracting labor.

Migrant workers

Besi expects its suppliers to ensure that both domestic and foreign migrant workers face no risk of exploitation and ensure migrant workers are not discriminated against in respect to these standards. Our suppliers shall only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations.

Health and Safety

Suppliers should recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers should also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health can be used as references and useful sources of additional information.

Occupational health and safety

Besi is committed to protect our employees' health and safety. Consequently, our suppliers shall provide a safe and healthy working environment for all their employees, monitor workers' potential for exposure to safety hazards, and minimize all risks and hazards at all workplaces to protect the health and well-being of their employees, contractors and third parties visiting the premises. Suppliers shall implement an occupational health and safety training management system determining when and how to use the equipment correctly and educational materials about risks associated with these hazards. Furthermore, our suppliers shall implement and administer an occupational health and safety system according to ISO 45001 or its equivalent.

Environment

Suppliers should recognize that environmental responsibility is integral to producing world-class products. Suppliers shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System ("EMAS") can be used as references and useful source of additional information.



Environmental protection

The protection of the environment is an integral part of Besim's business decisions, and we are committed to conduct our business in an environmentally responsible way. Consequently, our suppliers shall assume global and local environmental responsibilities and take the necessary steps to protect the environment in the various regions of the world in which they are operating and manage their business in a sustainable and transparent way. Our suppliers shall comply with all applicable environmental laws and regulations, including but not limited to laws and regulations that regulate hazardous materials, waste, key biodiversity areas, air and water emissions. Our suppliers shall train their staff regularly in environmental protection issues. Furthermore, our suppliers shall implement and administer an environmental management system according to EN ISO 14001 or its equivalent. Our suppliers shall minimize the environmental impact of their services, products, materials, tools and equipment at the earliest possible stage. Our suppliers shall strive to reduce their own carbon footprint, examine, track and document all relevant greenhouse gas emissions, and strive for energy efficiency. Our suppliers shall have emission reduction targets. Upon Besim's request, suppliers shall provide existing data on emissions on company and/or product level and any other relevant data in relation to matters covered under this Supplier Code of Conduct.

Conflict minerals

Besim is taking systematic steps to avoid the use of conflict minerals in its supply chain that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo ("DRC") and thereby achieving and maintaining a supply chain that is DRC conflict free. Therefore, Besim accepts only smelters in its supply chain that are certified according to the assurance process of the Responsible Minerals Initiative ("RMI"). Besim expects suppliers to support our effort to identify the origin of designated minerals used in our products by having due diligence measures in accordance with the Organisation for Economic Co-operation and Development ("OECD") guidelines ensuring that direct materials, parts, components and sub-assemblies supplied to Besim are DRC conflict free.

Business Ethics

To meet social responsibilities and to achieve success in the marketplace, suppliers are to uphold the highest standards of ethics, including relating to business integrity, no improper advantage, disclosure of information, intellectual property, fair business advertising and competition, protection of identity and non-retaliation, responsible sourcing of minerals according to OECD and privacy.

Besim's reputation depends on how we treat the people we deal with every day in conducting our business. Therefore, we uphold our reputation by:

- Abiding by the rules of fair competition and anti-trust laws.
- Working against corruption in all its forms.
- Not taking advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practices.
- Complying with applicable laws.
- Respecting contractual obligations.
- Avoiding any business behavior which might be considered improper.



- Protecting all confidential information.
- Respecting other parties' intellectual property.

Our suppliers shall comply with these principles.

Business gifts

Besi employees are not allowed to accept any gifts other than certain gifts of insignificant value. This includes the acceptance of any favors that might give rise to the appearance of improper influence. Our suppliers shall comply with this business practice.

Conflict of interest

The highest standards of integrity are to be upheld in business interactions with Besi. Besi respects the personal interests and private life of all employees. We take great care in avoiding conflict between private and business interests or even the mere impression thereof. Besi employees are required to act in a way that promotes our best interests and must disclose possible conflicts of interest. The employees of our suppliers shall refrain from offers that could give rise to the appearance of a conflict of interest for our employees. In case of a potential conflict of interest, e.g. due to family connections, our suppliers shall proactively inform Besi.

Contractual basis

Our suppliers shall only provide Besi with products or services based on an executed purchase order, supply contract or service contract.

Business contact

Besi's procurement department shall be the sole point of business contact for a supplier's sales department. Commercial terms and conditions (including but not limited to price, payment terms, delivery date and specification) shall only be discussed with the participation or consent of Besi's procurement department.

Management Systems

Suppliers shall adopt or establish a management system with a scope that is related to the content of the RBA. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products, (b) conformance with the RBA and (c) identification and mitigation of operational risks related to the RBA. It should also facilitate continual improvement. Suppliers must also produce updates on the status of their operations, such as providing financial statements reasonably requested by the Company.

Product Quality and Price

Besi expects suppliers to establish a quality assurance system in accordance with the ISO 9000 series of standards, so they are able to improve and maintain the quality of the products they deliver. Suppliers should also comply with the relevant safety standards of the countries and/or regions in which they operate. This includes standards such as China Compulsory Certificate ("CCC"), Japanese Industrial Standards ("JIS"), Electrical Appliance and Material Safety Law, Underwriters Laboratories ("UL") standards, Restriction of Hazardous Substances 3 Directive



and CE Marking.

To achieve this, and to enable Besic to provide safe, quality products to our customers, suppliers are requested to continually improve their technological capabilities. We expect our suppliers to provide goods and/or services at competitive prices so that we are able to price our own products competitively.

Maintaining Resilient Supply Chain

Suppliers must keep to agreed delivery commitments. Besic advises suppliers to establish systems that ensure a stable and flexible supply of goods and/or services in the event of unforeseen circumstances.

Our suppliers shall establish a robust and resilient supply chain and adequate processes to ensure uninterrupted product delivery and provision of services. We recommend that our suppliers implement and administer appropriate plans to ensure business continuity.

Our suppliers shall strongly support our efforts regarding security in the supply chain and the protection of our assets, in particular our intellectual property and products. Our suppliers shall ensure that their security policies are effectively implemented, regularly checked and continuously improved. Furthermore, our suppliers shall participate in relevant government security initiatives that are designed to strengthen the security of their supply chains and national borders and comply with security regulations defined by these initiatives. Examples of such initiatives include, but are not limited to, the secure trade partner programs according to "WCO SAFE Framework"¹. In addition, our suppliers shall ensure that their employees, affiliates, contractors and subcontractors and other business partners comply with the applicable foreign trade laws.

¹ Governmental programs according to the World Customs Organization Framework of Standards to Secure and Facilitate Global Trade ("WCO SAFE Framework") include Customs-Trade Partnership Against Terrorism ("CTPAT"), "Authorized Economic Operator ("AEO"), and Secure Trade Partnership ("STP-Plus").



References

Besi's Supplier Code of Conduct is based on the references listed below, which may be useful sources in case additional detailed information is needed.

Dodd-Frank Wall Street Reform and Consumer Protection Act:

<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Eco Management & Audit Scheme:

https://ec.europa.eu/environment/emas/index_en.htm

Ethical Trading Initiative:

www.ethicaltrade.org/

ILO International Labor Standards:

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001:

www.iso.org

National Fire Protection Association:

www.nfpa.org

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:

https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

OECD Guidelines for Multinational Enterprises:

https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

RBA Code of Conduct:

<https://www.responsiblebusiness.org/code-of-conduct>

SA 8000 :

<https://sa-intl.org/programs/sa8000/>

Social Accountability International ("SAI"):

<https://sa-intl.org>

United Nations Convention Against Corruption:

<https://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Convention on the Elimination of All Forms of Discrimination Against Women:

<https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>



United Nations Convention on the Rights of the Child:
<https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

United Nations Global Compact:
www.unglobalcompact.org

United States Federal Acquisition Regulation:
www.acquisition.gov/far/

Universal Declaration of Human Rights:
<https://www.un.org/en/universal-declaration-human-rights/>

This document will be reviewed annually and updated in accordance with best practice.